

9-30-22
Clerk, U. S. District Court
Western District of Texas
Deputy

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
EL PASO DIVISION**

**MICHELLE ARES,
Plaintiff,**

v.

**SCHNEIDER ELECTRIC USA,
Defendant.**

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EP-19-CV-00283-FM

JURY VERDICT FORM

HOSTILE WORK ENVIRONMENT (VICARIOUS LIABILITY)

QUESTION NO. 1

Was Jesus Estrada the supervisor of Plaintiff Michelle Ares?

Answer "Yes" or "No."

No

If you answered "No" to Question No. 1, then do not answer Questions No. 2, 3, 4, 5, and 6.

QUESTION NO. 2

Was Plaintiff Michelle Ares sexually harassed by Jesus Estrada?

Answer "Yes" or "No."

QUESTION NO. 3

Was Plaintiff Michelle Ares sexually harassed by others in front of Jesus Estrada?

Answer "Yes" or "No."

QUESTION NO. 4

Did Jesus Estrada report the sexual harassment?

Answer "Yes" or "No."

QUESTION NO. 5

Has Defendant Schneider Electric proved that it exercised reasonable care to prevent and promptly correct the harassing behavior?

Answer "Yes" or "No."

QUESTION NO. 6

Has Defendant Schneider Electric proved that Plaintiff Michelle Ares unreasonably failed to take advantage of or use any preventive or corrective opportunities provided by Defendant Schneider Electric or to avoid harm otherwise?

Answer "Yes" or "No."

HOSTILE WORK ENVIRONMENT (NEGLIGENCE)

QUESTION NO. 7

Did Plaintiff Michelle Ares's co-workers sexually harass her?

Answer "Yes" or "No."

YES

If you answered "Yes" to Question No. 7, then answer Question No. 8.

QUESTION NO. 8

Did Defendant Schneider Electric know, or in the exercise of reasonable care should have known, or was it communicated to a Schneider Electric or Aerotek employee with authority to receive, address, or report the complaint, that Michelle Ares was being sexually harassed?

Answer "Yes" or "No."

YES

If you answered "Yes" to Question No. 8, then answer Question No. 9.

